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Marlene Dortch
Secretary
Federal Communications Commission
445 12 Street, S.W.
Washington, D.C. 20554

Comments of PPL Susquehanna, LLC to ET Docket No. 05-345

PPL Susquehanna, LLC has purchased and used Telex audio communications equipment in areas where nuclear safety is dependent on audio communication. This equipment is generally used during important evolutions where clear communication is essential to allow safe performance of a complex activity. Although PPL Susquehanna, LLC has numerous methods of communication (2-way radios, pagers, portable phones, hard-wired phones, etc.), the Telex equipment is depended on for the very sensitive activities where this technology is far superior to these alternatives. These activities include surveillance testing, crane operation/heavy load movements, oversight and control of jobs in high dose or contamination areas, confined space entries, dry fuel storage evolutions, management oversight of complex evolutions, and movement of nuclear fuel (new and spent). In many of these activities, the Telex equipment is specifically used since it will not cause inadvertent actuation, alarm of equipment, or interfere with radio-controlled equipment (cranes) due to its low power output unlike hand-held 2-way radios (Walkie Talkies).

In most evolutions, the Telex systems are used inside concrete buildings especially during outages when the systems are extensively used to improve numerous aspects of nuclear safety. But the true benefit of the Telex technology is due to the operating frequency range inside of the concrete buildings. Due to the numerous rebar-reinforced concrete walls that are needed to provide adequate nuclear safety, this specific wave-length range give us the opportunity to send and receive signals without being in a "line of sight" configuration. With other technologies we have available on-site already or are available in the marked, there are numerous "dead spots" where the equipment cannot be used due to the "line of sight" transmission characteristics of the technology. In some situations, this caused less than optimal safety practices. With the use of the Telex systems, personnel can enter these "dead spot" areas carrying a headset / belt pack and communicate without any problems. This has improved nuclear safety considerably at minimal cost.

The use of Telex systems also has another major benefit. Using this technology in conjunction with closed-circuit video systems, a supervisor or Health Physics Technician (HP Tech) can perform surveillance on nuclear workers without accompanying the worker. With remote dosimetry and the surveillance system, the supervisor or Lead HP Technicians can better monitor the workers and job coverage HP Technicians remotely and be in constant communication. This system which uses Telex equipment as the communication component has eliminated dose, miscommunication due to noisy work environments, work delays (workers can communicate with leaving the work site to answer questions, request needed tools/parts, be given step-by-step instructions, etc.) plus numerous other problems. This combined system has also improved worker productivity in high dose and contamination areas since they can use the hands-free technology of the Telex system. Again, all these benefits and nuclear safety improvements are available through the Telex system by the nuclear worker donning a headset / belt pack in conjunction with remote dosimetry and a closed-circuit video system. This benefit is not available with "line of sight" technologies since additional equipment would need to be installed to compensate for the technology's shortfalls in the nuclear environment. This is just not cost effective or in line with the ALARA (As Low As Reasonably Achievable) for dose control.

In addition to the above reasons, the Telex technology has been selected for use in nuclear facilities for the following reasons:

- The low output power does not interfere with other communication or control systems at the plant or in the surrounding neighborhood.
- The low output power does not cause inadvertent actuation or alarm of sensitive equipment. This is very important when working around radiation detectors since most alternate technologies will activate this sensitive equipment.
- The workers can work hands-free when needed.
- There is no other equipment on the market that provides the same benefits since the frequency range that Telex operates in is what makes this technology superior in a nuclear plant.
- The wave-length range allows the equipment to work in very congested environments present in nuclear plants cost effectively and efficiently.
- Enhances communication between work groups by allowing the people to talk directly to each other with minimal setup.
- Noise elimination is much superior to the other technologies available. Since most power plants are very noisy, use of Telex equipment prevents confusion caused by trying to be understood in a noisy environment.
- Is compatible with all other technologies presently used at the plants.
- Has full duplex capability that is not present in 2-way radios.
- Allows personnel to provide real-time input. This improves productivity and safety by not having multiple entries into the same area.
- Has been proven to be the best technology for critical communications. After attempting to provide uninterruptible communication on several critical evolutions (High dose rate Health Physics job coverage, fuel movements, Nondestructive In-Service Inspection, plant system and valve alignments, load

movements with cranes, etc.). Telex equipment was found to be the most dependable with no interruptions.

- Improves outage performance by having direct communication between personnel in the field.

In summary, the nuclear industry needs to use the Telex technology to continue the improvements we have experienced. The use of this technology at nuclear plants has never interfered with the broadcast or entertainment industry in anyway and is not expected to interfere in the future. Without this technology, we will be taking a step back to a time when communications at nuclear plants were inferior to what is present today with the Telex technology.

Respectfully submitted,

/s/ James G. Jessick
Foreman-Health Physics-SSES

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